

Message

From: Ayres, Sara [Ayres.Sara@epa.gov]
Sent: 2/16/2022 8:30:17 PM
To: Wortman, Eric [Wortman.Eric@epa.gov]; Dykes, Teresa [Dykes.Teresa@epa.gov]
CC: Bird, Patrick [Bird.Patrick@epa.gov]; Sansevero, Christine [Sansevero.Christine@epa.gov]; Howlett, Careyanne [Howlett.Careyanne@epa.gov]; King, Melanie [King.Melanie@epa.gov]
Subject: RE: MACT ZZZZ Compliance for OCS Source Vessels

Ex. 5 Deliberative Process (DP)

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From: Wortman, Eric <Wortman.Eric@epa.gov>
Sent: Wednesday, February 16, 2022 1:52 PM
To: Dykes, Teresa <Dykes.Teresa@epa.gov>; Ayres, Sara <Ayres.Sara@epa.gov>
Cc: Bird, Patrick <Bird.Patrick@epa.gov>; Sansevero, Christine <Sansevero.Christine@epa.gov>; Howlett, Careyanne <Howlett.Careyanne@epa.gov>; King, Melanie <King.Melanie@epa.gov>
Subject: MACT ZZZZ Compliance for OCS Source Vessels

Hi Terri & Sara,

Ex. 5 Deliberative Process (DP)

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1. For a vessel that attaches and detaches from an OCS facility, are the hours for Subpart ZZZZ maintenance intervals to be tracked only while the vessel is connected? Once a vessel disconnects from an OCS Source, it may lose its qualification as an OCS Source Vessel and would therefore no longer be subject to Subpart ZZZZ under Permit Condition VI.B.1.

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2. How is the annual requirement to be implemented for a vessel that only attaches for minutes at a time and for most of the time it operates it is not associated with an OCS facility? A vessel that only attaches once to an OCS Source will not have to comply with Subpart ZZZZ if it never associates with the project again, but this is not entirely clear.

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